

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13

Andrew J. Reed :  
DEBTOR : BKY. NO. 17-10567JKF13

Andrew J. Reed :  
Plaintiff :

vs. : ADV. NO.

Nationstar Mortgage ,LLC  
d/b/a Mortgage Company  
Champion Mortgage Company :  
Defendant :

**COMPLAINT TO DETERMINE SECURED STATUS**

1. Debtor filed for protection under Chapter 13 on January 25, 2017.
2. Debtor owes his residence known as 2718 W. York Street, Philadelphia, PA with a value of \$21,036. **Exhibit A**
3. Debtor owns the property subject to an inherited reverse mortgage with defendant Nationstar who has filed a claim for \$40,104.27
4. Debtor has superior liens on Nationstar as follows:

City of Philadelphia (real estate)	\$1,035.27
City of Philadelphia (water and sewage)	\$730.42

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Total : \$1,765.69

5. Based on the above the allowed secured claim of the mortgage is \$19,270.31.
6. Debtor seeks an order finding the secured claim to be \$19,270.3.

WHEREFORE, Debtor prays that this Honorable Court enter an order determining the secured claim of the defendant to be \$19,270.31.

Respectfully submitted,

Date: **July 17, 2017**

BY: /s/ Michael A. Cataldo  
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